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August 26, 2024

ByECF

Hon. J. Paul Oetken
U.S. District Judge
U.S. Courthouse 40
Foley Square,
New York, N.Y. 1000

Re: Rodney Jones v. Sean Combs, et al
24 Civ. 1457 (JPO)

Dear Judge Oetken:

Deborah Colson and I represent Kristina Khorram, one of the defendants in the above-captioned action. Ms. Khorram is named only in the first cause of action (the civil RICO claim) and the sixth cause of action, alleging violation of the Trafficking and Victims' Protection Act. I have reviewed the motion to dismiss filed on behalf of the defendant Sean Combs and several of his corporate entities. The legal arguments made on behalf of Mr. Combs in support of his motion to dismiss the civil RICO claim and the claim for violation of the Trafficking and Victims' Protection Act apply with equal force to Ms. Khorram and accordingly, we respectfully request permission to join in the motion to dismiss filed on behalf of Mr. Combs.

Thank you in advance for your consideration of this request.

Respectfully submitted,

avraham moskowitz

Avraham C. Moskowitz
Deborah Colson